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## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE:	)	
	) CASE NO. 21 b 0347	0
Genell Anderson,	) HON. Barnes	
	) CHAPTER 7	
DEBTOR.	)	

#### **NOTICE OF MOTION**

TO:

Richard M. Fogel Chapter 7 Trustee Cozen O'Connor 123 N. Wacker Drive Suite 1800 Chicago, IL 60606

Genell Armstrong 400 Manda Lane, Unit 405 Wheeling, IL 60090

PLEASE TAKE NOTICE that on April 5, 2021 at 1:00 p.m., I will appear before the Honorable Barnes, or any judge sitting in that judge's place, and present the Motion to Withdraw as Attorney for Genell Anderson, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government.

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: https://www.zoomgov.com/. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 161 329 5276 and the

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If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ Janna L. Quarless\_

The Semrad Law Firm, LLC 20 S. Clark Street, Suite 2800 Chicago, IL 60602

jquarless@semradlaw.com

#### **CERTIFICATE OF SERVICE**

I, Janna Quarless, an attorney, certify declare under penalty of perjury under the laws of the United States of America that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on March 24, 2021 at 5:00 p.m.

Case 21-03470 Label Matrix for local noticing 0752-1 Case 21-03470 Northern District of Illinois Eastern Division Wed Mar 24 15:53:23 CDT 2021 CRESCENT BANK AND TRUS

Eastern Division 219 S Dearborn 7th Floor Chicago, IL 60604-1702

Doc 11 Filed 03/24/21 Entered 03/24/21 16:02:10 Desc Main Page 3 of 6 P.O. Box 111 Miami, OK 74355-0111

1100 POYDRAS ST STE 100 NEW ORLEANS, LA 70163-0100

Check Advance 3417 Main Street Stevens Point, WI 54481-4333

City Of Chicago - Parking And Red Light 121 N. LaSalle Street Chicago, IL 60602-1202

Credit Coll 16 Distributor Drive, Suite 1 Morgantown, WV 26501-7209

Dept Of Ed/Navient PO BOX 9635 WILKES BARRE, PA 18773-9635 Fast Day Loans PO Box 44 #1 Wakpamni Lake Housing Batesland, SD 57716-0044

First National Collection Bureau 610 Waltham Wav Sparks, NV 89437-6695

First Premier Bank PO Box 7999 c/o Stephen Dirksen Saint Cloud, MN 56302-7999 Floury, Herby 400 Manda Lane Wheeling Illinois 60090-3893

Geico Insurance Company One Geico Center Macon, GA 31296-0001

Gm Financial 801 Cherry St Ste 3900 Fort Worth, TX 76102-6839

I.c. System Inc P.O. Box 64444 Saint Paul, MN 55164-0444

Liberty Mutual Insurance Company 100 Liberty Way Dover, NH 03820-4597

Midland Funding PO Box 13105 Roanoke, VA 24031-3105

(p) NATIONAL CREDIT SYSTEMS ATTN MELANIE MAYFIELD 3750 NATURALLY FRESH BLVD ATLANTA GA 30349-2964

Northshore University Healthsystem 1301 Central St # 218 Evanston, IL 60201-1613

Pine Hill Apartment 600 S Pine Hill Rd Griffin Georgia 30224-8325 Portfolio Recov Assoc POB 41067 Norfolk, VA 23541-1067

Progressive Insurance P.O. Box Norwood, MA 02062

Reliable Medical Supply 200 E. Howard Ave Suite 246 Des Plaines, IL 60018-5909 Target Cash Now P.O. Box 581 Hays, MT 59527-0581

Wlcc Lending Ffg Dba Falcon Funding Group P.O. Box 171 #1 Batesland, SD 57716-0171

Genell Armstrong 400 Manda Lane Unit 405 Wheeling, IL 60090-3810 Michael A Miller The Semrad Law Firm, LLC 20 S. Clark, 28th Floor Chicago, IL 60603-1811

Patrick S Layng Office of the U.S. Trustee, Region 11 219 S Dearborn St. Room 873 Chicago, IL 60604-2027

Richard M. Fogel Cozen O'Connor 123 N. Wacker Drive Suite 1800 Chicago, IL 60606-1770 Case 21-03470 Doc 11 Filed 03/24/21 Entered 03/24/21 16:02:10 Desc Main Document Page 4 of 6

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

National Credit System P.O. Box 312125 Attn: Rebecca Bonds Atlanta, GA 31131 End of Label Matrix
Mailable recipients 28
Bypassed recipients 0
Total 28

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### IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE:	)	
	)	CASE NO. 21-03470
Genell Anderson,	)	HON. Barnes
	)	CHAPTER 7
DEBTOR.	)	

#### MOTION TO WITHDRAW AS ATTORNEY

NOW COMES the Debtor's Counsel, The Semrad Law Firm, LLC, and hereby moves this Honorable Court for leave to withdraw as counsel for Debtor. In so moving, Debtor's Counsel states as follows:

- 1. That the Debtor filed a Chapter 7 Voluntary Petition on March 17, 2021
- 2. Debtor's counsel diligently represented her Debtor in the Chapter 7 bankruptcy case.
- 3. Counsel believes they cannot effectively represent her in the bankruptcy case.
- 4. Counsel believes there is a possible conflict and the Debtor and her attorney have come to a mutual decision to have counsel withdraw from the case.
- 5. Attorneys Michael A. Miller and Janna Quarless of The Semrad Law Firm, LLC wish to be removed as attorneys of record in the instant case.
- 6. The Semrad Law Firm, LLC respectfully requests this Honorable Court grant the Debtor's counsel leave to withdraw from the instant case.

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WHEREFORE, The Semrad Law Firm, LLC, Debtor's Counsel, respectfully prays that this Honorable Court enter an Order granting leave to withdraw as attorney from the instant case, along with any and all other relief this Court deems just and fair.

Respectfully Submitted,

/s/ Janna Quarless\_\_\_\_\_ Attorney for Debtor

The Semrad Law Firm, LLC 20 S. Clark Street, 28<sup>th</sup> Floor Chicago, IL 60603 (312) 913-0625